

M. RICHARD BEACHLEY	*	
Complainant	*	NO. 33,070 EQUITY
vs.	*	IN THE CIRCUIT COURT
RANDY D. SOWERS	*	FOR
and	*	
KAREN B. SOWERS	*	FREDERICK COUNTY,
Respondent	*	MARYLAND
*	*	*

MOTION FOR DECREE PRO-CONFESSO

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Now comes the Complainant, M. RICHARD BEACHLEY, by and through his attorney, Russell T. Horman, and states as follows:

FIRST: That the Bill of Complaint to Establish Boundary Lines was filed herein on December 3, 1982.

SECOND: That Respondents, RANDY D. SOWERS and KAREN B. SOWERS, were personally served by the Sheriff for Frederick County, Maryland, on December 5, 1982, and were summonsed to the December, 1982 return day.

THIRD: That the time provided by law for the Respondents to respond to this action has expired.

FOURTH: That Respondents, RANDY D. SOWERS and KAREN B. SOWERS, have failed to appear either in person or by solicitor within the time allowed by law, and that your Complainant desires to take testimony before one of the standing Examiners of this Court to support the allegations of said Bill of Complaint.

TO THE END, THEREFORE,

1. That the Bill of Complaint to Establish Boundary Lines be taken Pro-Confesso against the Respondents, RANDY D. SOWERS and KAREN B. SOWERS.

2. That your Complainant be permitted to take testimony before one of the standing Examiners of this Court to support